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Individually and on Behalf of All Those Similarly Situated*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

SHANNON RAY, KHALA TAYLOR, PETER
ROBINSON, KATHERINE SEBBANE, and
RUDY BARAJAS Individually and on Behalf of
All Those Similarly Situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, an unincorporated association,

Defendant.

Case No. 1:23-cv-00425

**PLAINTIFFS' NOTICE OF REQUEST
TO SEAL DOCUMENTS**

Judge: Hon. William B. Shubb
Courtroom: 5, 14th Floor
Date: March 3, 2025
Time: 1:30 PM

TO DEFENDANT AND ITS ATTORNEYS OF RECORD AND TO THE UNITED STATES
DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA:

Pursuant to Local Rule 141, please take notice that on November 1, 2024, Plaintiffs Shannon Ray, Khala Taylor, Peter Robinson, Katherine Sebbane, and Rudy Barajas (“Plaintiffs”) submitted the following documents by uploading to the “Box” application for United States District Judge William B. Shubb and served by electronic mail the following documents on all Defendants:

1. Plaintiffs’ Notice of Motion and Motion for Class Certification (Sealed Version);
2. Exhibit 1 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class Counsel;
3. Exhibit 27 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class Counsel;
4. Exhibit 28 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class Counsel;
5. Exhibit 29 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class Counsel;
6. Exhibit 30 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class Counsel;
7. Exhibit 31 to the Declaration of Michael Lieberman in Support of Plaintiff’s Motion for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class Counsel;

- 1 8. Exhibit 32 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
2 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
3 Counsel;
- 4 9. Exhibit 33 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
5 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
6 Counsel;
- 7 10. Exhibit 34 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
8 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
9 Counsel;
- 10 11. Exhibit 35 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
11 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
12 Counsel;
- 13 12. Exhibit 36 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
14 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
15 Counsel;
- 16 13. Exhibit 37 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
17 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
18 Counsel;
- 19 14. Exhibit 38 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
20 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
21 Counsel;
- 22 15. Exhibit 39 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
23 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
24 Counsel;
- 25 16. Exhibit 40 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
26 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
27 Counsel;
- 28

1 17. Exhibit 41 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
2 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
3 Counsel;

4 18. Exhibit 42 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
5 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
6 Counsel;

7 19. Exhibit 43 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
8 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
9 Counsel;

10 20. Exhibit 44 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
11 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
12 Counsel;

13 21. Exhibit 45 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
14 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
15 Counsel;

16 22. Exhibit 46 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
17 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
18 Counsel;

19 23. Exhibit 47 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
20 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
21 Counsel;

22 24. Exhibit 48 to the Declaration of Michael Lieberman in Support of Plaintiff's Motion
23 for Class Certification and Appointment of Fairmark Partners, LLP as co-Lead Class
24 Counsel;

25 25. Plaintiff's Request to Seal; and

26 26. [Proposed] Order Granting Plaintiff's Request to Seal.

27 Plaintiffs' Request to Seal is made pursuant to Local Rule 141(b) and is based upon this
28 Request, all pleadings, papers, and records on file in this action, and any oral argument presented

to the Court. The Court may issue orders limiting disclosures of confidential information where compelling reasons exist. *See Pintos v. Pac. Creditors Ass'n*, 605 F.3d 665, 677-78 (9th Cir. 2010); *Felix v. Davis Moreno Constr., Inc.*, No. 07 Civ. 0533, 2008 WL 3009867, at *1-2 (E.D. Cal. Aug. 1, 2008); E.D. Cal. L.R. 141. Plaintiffs make this request as required by the Stipulated Protective Order (ECF No. 56) because Plaintiffs' Notice of Motion and Motion for Class Certification and particular exhibits to the supporting Declaration of Michael Lieberman contain information designated "CONFIDENTIAL" or "ATTORNEYS' EYES ONLY" pursuant to the Stipulated Protective Order in this case.

Concurrent with the submission of this Request, Plaintiffs have filed versions of the above documents through the Court's CM/ECF system that contain redactions of information or materials that have been designated as Confidential or Attorneys' Eyes Only.

DATED: November 1, 2024

Respectfully submitted,

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